

Motion GRANTED.

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

ENRIQUE RAMIREZ-INFANTE

)
)
)
)
)

No. 3:13-00052
JUDGE TRAUGER



MOTION TO CONTINUE TRIAL

Through counsel, defendant Enrique Ramirez-Infante moves to continue the August 13, 2013, trial. Mr. Ramirez-Infante is detained pending trial.

In support of this motion, defense counsel would show the following: Defense counsel has met with Mr. Ramirez-Infante to review discovery and discuss legal issues in his case. Defense counsel is still investigating factual information related to legal and sentencing issues which must be investigated before Mr. Ramirez-Infante can make a knowing or intelligent decision as to how he should proceed. Mr. Ramirez-Infante has requested that his trial date be postponed until counsel completes this investigation.

Defense counsel has discussed the Speedy Trial Act with Mr. Ramirez-Infante, who concurs in the request for a continuance and will be filing a speedy trial waiver.

Counsel conferred with Assistant U.S. Attorney Cecil VanDevender, who advised that he does not oppose a continuance of this matter.

For these reasons, the defendant moves to continue the August 13, 2013, trial.

Respectfully submitted,

/s/ *Caryll S. Alpert*
CARYLL S. ALPERT, BPR #017021
Assistant Federal Public Defender
810 Broadway, Suite 200
Nashville, TN 37203
615-736-5047
E-mail: caryll_alpert@fd.org

Attorney for Enrique Ramirez-Infante